



February 14, 2011

CERTIFIED MAIL

Ms. Joyce Smith
Industrial Stormwater Coordinator
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Re: Saint-Gobain Containers, Inc.
Seattle, WA Facility
4th Quarter 2010 Stormwater Report

Dear Ms. Smith:

Attached is the 4th Quarter 2010 Stormwater Report for Saint-Gobain Containers' Seattle Facility. This report documents the conditions which precluded stormwater sampling at the facility during 4th Quarter of 2010 (October through December). Suitable sampling conditions or sampling times, as defined in the *Saint-Gobain Contingency Emergency and Spill Prevention Plan*, were not available to collect stormwater samples during this period. Precipitation and tidal data are included to demonstrate that difficult stormwater sampling conditions existed during this monitoring period.

Should the Washington State Department of Ecology have any questions or require additional information, please do not hesitate to contact the undersigned at (206) 768-6221.

Very truly yours,
Saint-Gobain Containers

Doug Coburn
Plant Manager

Cc: D. Coburn M. Gibbons A. Kariko
T. Thommasson V. Krulic J. Browning

MONITORING PERIOD for (year/quarter):	2010 year	Jan/Feb/Mar	Apr/May/Jun	Jul/Aug/Sep	Oct/Nov/Dec
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Mailing Information


SAINT GOBAIN CONTAINERS INC
5801 E MARGINAL WAY S
SEATTLE WA 98134-2413

Primary SIC Code: 3221

Discharge Point <u>002 Outfall</u>						
There was no qualifying storm event this quarter so no values are entered below (see explanation)						
Quarterly Monitoring		AVERAGE	MAXIMUM	UNITS	Sample Type	Events Sampled
Turbidity	Consistent Attainment	Not Sampled	8.1	NTU	Grab	1
pH	Consistent Attainment	Not Sampled	7.9J	Standard Units	Grab	1
Zinc (total)	Consistent Attainment	Not Sampled	55	ug/l	Grab	1
Oil And Grease	Consistent Attainment	Not Sampled	4.9U	mg/l	Grab	1
TSS	Consistent Attainment	Not Sampled	5.2	mg/l	Grab	1
Copper	Consistent Attainment	Not Sampled	15	ug/l	Grab	1
Lead	Consistent Attainment	Not Sampled	2.4	ug/l	Grab	1
Hardness	Consistent Attainment	Not Sampled	32	mg/l	Grab	1

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC 1001 AND 33 USC 1319. (PENALTIES UNDER THESE STATUTES MAY INCLUDE FINES UP TO \$10,000.00 AND OR MAXIMUM IMPRISONMENT OF BETWEEN SIX MONTHS AND FIVE YEARS.)

DATE: MO DAY YEAR 2/14/2011


SIGNATURE OF TITLE OF PRINCIPAL EXECUTIVE OFFICER

206-768-6272
TELEPHONE NUMBER

COMMENTS/EXPLANATIONS: Hardness calculated from: $2.5 \cdot (\text{Ca}^{2+}) + 4.1 \cdot (\text{Mg}^{2+}) = \text{Hardness}$



February 11, 2010

Mr. Marlon Trigg
Saint-Gobain Containers
5801 East Marginal Way South
Seattle, WA 98134-2497

Stormwater Sampling Report
Saint-Gobain Containers Facility
4th Quarter 2010
URS Project No.: 33762495

Dear Mr. Trigg:

URS Corporation (URS) is pleased to present this stormwater sampling report for the 4th Quarter 2010 sampling event at the Saint-Gobain Containers facility located at 5801 East Marginal Way South in Seattle, Washington (Site). This report documents the conditions which precluded stormwater sampling at the facility during 4th Quarter of 2010 (October through December). Suitable sampling conditions or sampling times, as defined in the *Saint-Gobain Contingency Emergency and Spill Prevention Plan*, were not available to collect stormwater samples during this period. Precipitation and tidal data are included to demonstrate that difficult stormwater sampling conditions existed during this monitoring period.

Analytical Results

Stormwater samples were not collected during the 4th Quarter 2010. Consequently, there are no analytical results to report. The lack of storm events during appropriately timed tidal cycles is described in detail in the following section.

Rainfall Analysis

The monitoring guidelines established in Section 9.9.2, Benchmark Monitoring, of the *Saint-Gobain Contingency Emergency and Spill Prevention Plan* (the Plan), stipulate that sampling:

- 1) does not occur when greater than 0.01 inches of precipitation occurred in the previous 24 hours;
- 2) be completed on storm events that produce at least 0.1 inches of rain in a 24-hour period;
- 3) occur within the six hours after discharge begins or as soon as possible thereafter; and
- 4) occur during daylight hours because of safety restrictions associated with working alongside the Duwamish River.

In addition to the sampling guidelines, physical access to the sampling outfall is restricted to when the tide is less than seven (7) feet above mean lower low tide to allow the outfall to flow freely without any river water being mixed with outfall discharge.

Based on the sampling protocol and the daily precipitation record for Boeing Field airport, fourteen rain events met Guidelines 1 and 2 for precipitation in a 24-hour period during the fourth quarter (Table 1). The hourly precipitation data for Boeing Field, though, in conjunction with daylight hours and the Duwamish River daily tide data indicate that only five precipitation events would have been accessible and/or free flowing (not mixed with backed up tidal waters) for sampling during the fourth quarter 2010 (Table 2 bold type). Of those five precipitation events, four occurred during weekend days when the Plan specifies sampling is not required because it is outside of regular business hours.

Based on the criteria specified in the Plan and the combination of sampling restrictions at the St. Gobain Containers facility on Marginal Way South in Seattle, only one precipitation event met Guidelines 1 and 2. Total precipitation during the November 17 rainfall event was 0.12 inches starting after 6:00 a.m. and ending before 3:00 p.m. (Table 3). Approximately 0.08 inches of rain fell before the outfalls were submerged at about 10:00 a.m. (Figure 1), not enough precipitation per Guideline 1 to initiate sampling prior to the outfall's submersion. Rainfall exceeded the 0.1 inch threshold by about 2:00 p.m. Tides did not drop below the outfall elevation to allow sampling until about 4:30 p.m, more than 1.5 hours after the precipitation ended. Per Guidelines 3 and 4, sampling was not feasible.

Visual Monitoring Results

Visual monitoring of the Saint-Gobain stormwater outfalls was not completed because no accessible and representative storm events occurred during the fourth quarter as explained in the previous section, Rainfall Analysis.

Please contact us if you have any questions or require additional information.

Very truly yours,

URS Corporation

William T Kidder

William Kidder
Project Scientist

Jessica Wellmeyer

Jessica Wellmeyer
Project Manager

Attachments:
Tables 1, 2 & 3
Figure 1

Table 1. 24-hour precipitation at Boeing Field Airport during fourth quarter 2010

October			November			December		
Date	Prior 24 hour total precipitation (tenths of an inch) ²	Meets Sampling Criteria ³	Date	Prior 24 hour total precipitation (tenths of an inch) ²	Meets Sampling Criteria ³	Date	Prior 24 hour total precipitation (tenths of an inch) ²	Meets Sampling Criteria ³
1			1	0.02		1	0.61	
2			2	1.35		2		
3			3			3	0.01	
4			4			4		
5			5		X	5		
6			6	0.18		6		
7	0.01		7	0.7		7	0.01	
8			8			8	0.65	
9	0.21	X	9		X	9	0.86	
10	1.26		10	0.2		10	0.68	
11	0.54		11			11		X
12			12	0.08		12	2.32	
13			13		X	13	1.39	
14		X	14	0.29		14	0.49	
15	0.13		15	0.13		15	0.42	
16			16	0.03		16	0.1	
17			17		X	17	0.02	
18			18	0.21		18		X
19			19	0.05		19	0.17	
20			20	0.09		20		X
21	0.01		21			21	0.1	
22	0.14	X	22			22	0.02	
23		X	23	0.07		23	0.01	
24	0.66		24			24	0.48	
25	0.58		25			25	0.56	
26	0.3		26	0.17	X	26	0.16	
27	0.17		27	0.23		27	0.27	
28		X	28	0.03		28	0.43	
29	0.12		29	0.04		29		
30		X	30	0.18		30		
31	0.53					31		

1. Boeing Field airport precipitation data downloaded on 5 January 2011 from University of Utah's MesoWest weather observation archive website available at http://mesowest.utah.edu/cgi-bin/droman/meso_base.cgi?stn=kbf1.
2. Total daily precip is tabulated automatically each morning at 5:00 a.m. (4:00 a.m. during daylight savings time) for the previous 24 hours. The daily totals are reported on the date tabulated, though the precipitation may have occurred during the previous day.
3. Dates that the precipitation events met the sampling criteria. The dates may not always correspond with the dates precipitation totals are recorded. Please see table note 2 for explanation.

Table 2. Precipitation data from Boeing Field¹ and Duwamish River² tide data on possible sampling days.

Date	Precipitation (tenths of inch)	Precipitation Period (approximate time of day)	Predicted Tide > 7 Feet (approximate time of day)	Predicted High Tide Height (feet above MLLW)
October 8-9, 2010 (Saturday)	0.21	11:00 p.m. – 5:00 a.m. (Oct 9)	4:30 a.m. – 10:00 a.m.	11.4
October 14, 2010	0.12	3:00 p.m. – 6:00 p.m.	9:00 a.m. – 12:00 a.m., very small window at 6:30 p.m. tide was 6.44 feet	10.3, 7.93
October 22, 2010	0.12	3:00 a.m. – 4:00 a.m.	3:30 a.m. – 9 a.m.	10
October 23, 2010 (Saturday)	0.31 in. through 11:00 p.m.	Began after 3:00 p.m. and continued through Oct 25	2:00 p.m. – 8:00 p.m.	9.8
October 28-29, 2010	0.08	5:00 a.m. – 4:00 p.m.	7:30 a.m. – 10:00 p.m., midday low tide 7.2 feet at 4:00 p.m.	11, 9
	0.04	11:00 p.m. – 2:00 a.m. (Oct 29)		
October 30-31, 2010 (Sat – Sun)	0.53	After 10:00 a.m. – 2:00 a.m. (Oct 31)	9:00 a.m. – 4:30 p.m. 8:30 p.m. – 1:00 a.m. (Oct 31)	10.7 7.9
November 5, 2010	0.11	After 4:00 p.m. – 11:00 p.m.	1:00 p.m. – 7:00 p.m.	11.7
November 9, 2010	0.11	7:00 a.m. – 1:00 p.m.	5:00 a.m. – 8:30 p.m., brief midday low tide at 1:30 p.m. at 6.86 feet	11.8, 9.8
November 13-14, 2010 (Sat - Sun)	0.06	After 4:00 p.m. – 9:00 p.m.	No restrictions	
	0.23	After 11:00 p.m. – 4:00 a.m.		
November 17, 2010	0.12	6:00 a.m. – 3:00 p.m.	10:00 a.m. – 4:30 p.m.	10.5
November 26, 2010	0.26	2:00 a.m. – 6:00 a.m.	6:00 a.m. – 2:00 p.m.	11.8
December 11-12, 2010 (Sat - Sun)	0.95	After 11:00 a.m. – 10:00 p.m. but continued to rain	6:00 a.m. – 1:00 p.m. 6:30 p.m. – 10:00 p.m.	11.6 7.69
December 18, 2010 (Saturday)	0.02	8:00 a.m. – 9:00 a.m.	2:00 a.m. – 4:00 p.m., midday low 7.92 feet at 8:58 a.m.	10.3, 10.5
	0.11	2:00 p.m. – 4:00 p.m.		
December 19, 2010 (Sunday)	0.04	1:00 a.m. – 3:00 a.m.	2:00 a.m. – 5:00 p.m., midday low 8.06 feet at 9:49 a.m.	11, 10.5
	0.1	9:00 p.m. – 11:00 p.m.		
December 20, 2010	0.05	11:00 a.m. – 4:00 p.m.	3:00 a.m. – 5:30 p.m., midday low 8.04 feet at 10:33 a.m.	11.4, 10.6
December 21, 2010	0.03	2:00 a.m. – 4:00 a.m.	3:00 a.m. – 6:00 p.m., midday low 7.86 feet at 11:14 a.m.	11.8, 10.6

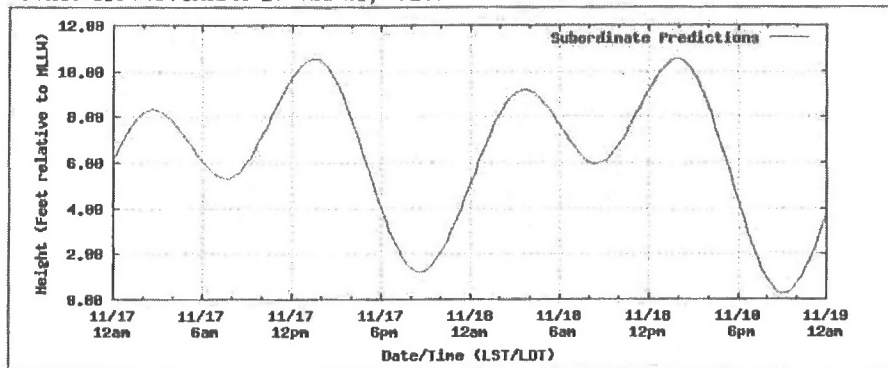
1. Boeing Field airport precipitation data downloaded on 5 January 2011 from University of Utah's MesoWest weather observation archive website available at http://mesowest.utah.edu/cgi-bin/droman/meso_base.cgi?sta=kbj.
2. Tide data for 8th Avenue bridge downloaded on 6 November 2010 from the NOAA Tides and Currents, 2010 Water Level Tidal Predictions website available at <http://co-ops.nos.noaa.gov/tides09/>.

Table 3. Raw precipitation data from Boeing Field weather station.

<u>Date and Time</u>	<u>Precipitation (tenths of an inch)</u>
11-17-2010 1:53 PST	
11-17-2010 2:53 PST	
11-17-2010 3:53 PST	0
11-17-2010 4:53 PST	0
11-17-2010 5:53 PST	0
11-17-2010 6:53 PST	0.01
11-17-2010 7:53 PST	0.01
11-17-2010 8:53 PST	0.04
11-17-2010 9:53 PST	0.02
11-17-2010 10:53 PST	0.01
11-17-2010 11:53 PST	0
11-17-2010 12:53 PST	0
11-17-2010 13:53 PST	0.01
11-17-2010 14:53 PST	0.02
11-17-2010 15:53 PST	0
11-17-2010 16:53 PST	
11-17-2010 17:51 PST	

Source: Boeing Field airport precipitation data downloaded on 5 January 2011 from University of Utah's MesoWest weather observation archive website available at http://mesowest.utah.edu/cgi-bin/dromm/meso_base.cgi?stn=kbfj.

Figure 1: Tide predictions for the Duwamish Waterway, Eighth Ave. South station for November 17 and 18, 2010.



Source: Tide data downloaded on 6 November 2009 from the NOAA Tides and Currents, 2009 Water Level Tidal Predictions website available at <http://co-ops.nos.noaa.gov/tides09/>.